

1 DARIN W. SNYDER (S.B. #136003)  
2 dsnyder@omm.com  
3 ALEXANDER B. PARKER (S.B. #264705)  
4 aparker@omm.com  
5 BILL TRAC (S.B. #281437)  
6 btrac@omm.com  
7 ASHISH SUDHAKARAN (S.B. # 312941)  
8 asudhakaran@omm.com  
9 O'MELVENY & MYERS LLP  
10 Two Embarcadero Center, 28th Floor  
11 San Francisco, California 94111-3823  
12 Telephone: (415) 984-8700  
13 Facsimile: (415) 984-8701

8 Attorneys for Defendants  
9 JADOOTV, INC., SAJID SOHAIL,  
and HASEEB SHAH

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **WESTERN DIVISION**

14 DISH NETWORK L.L.C.,  
15  
16 Plaintiff,

17 v.

18 JADOOTV, INC., SAJID SOHAIL,  
19 HASEEB SHAH, EAST WEST  
AUDIO VIDEO, INC., and PUNIT  
BHATT,

20 Defendants.

Case No. 2:18-cv-09768-FMO-KS

**DECLARATION OF  
ALEXANDER B. PARKER IN  
SUPPORT OF DEFENDANT  
HASEEB SHAH'S EX PARTE  
APPLICATION TO EXTEND  
TIME TO RESPOND TO  
COMPLAINT**

[Filed concurrently herewith (1) Ex  
Parte Application, (2) Proposed  
Order]

**DECLARATION OF ALEXANDER B. PARKER**

I, Alexander B. Parker, under penalty of perjury, declare as follows:

1. I am an attorney at law, duly admitted and in good standing to practice in the State of California and the United States District Court for the Central District of California, and am an attorney at the firm O'Melveny & Myers LLP, counsel for Defendant Haseeb Shah ("Shah") for the limited purpose of contesting service and personal jurisdiction. I submit this declaration based upon my personal knowledge in support of Defendant Haseeb Shah's Ex Parte Application to Extend Time to Respond to Complaint. I have personal knowledge of the facts set forth herein and, if called upon, I could and would testify thereto.

2. My law firm was retained by Mr. Shah the morning of May 10, 2019 to represent him in this action for the limited purpose of contesting service and personal jurisdiction.

3. On May 10, 2019, my law firm asked DISH for a 21-day extension on the time for Mr. Shah to respond to the Complaint. DISH agreed only to a 7-day extension. The parties filed a stipulation pursuant to Civil Local Rule 8-3, extending the time for Mr. Shah's response to the Complaint by 7 days, to May 17, 2019. *See* Dkt. No. 70.

4. In my communications with Mr. Shah, Mr. Shah informed me that he was not personally served with the complaint and summons.

5. Mr. Shah informed me that he did not sign the "Acknowledgement Receipt" that is part of the proof of service filed by DISH purportedly showing personal service of the complaint and summons on Mr. Shah. *See* Dkt. No. 66 at 4.

6. Mr. Shah informed me that the "Recipient Signature" on the "Acknowledgement Receipt" of the proof of service is not his signature.

7. Mr. Shah informed me that he was not in Islamabad on April 19, 2019, which is the date and location where he was purportedly personally served according to the filed proof of service. *See* Dkt. No. 66 at 6.

1           8. My law firm and I were unaware that DISH was claiming personal  
2 service of Mr. Shah until DISH filed the proof of service on May 7, 2019. After  
3 learning that DISH was claiming service, we promptly investigated the matter and  
4 were soon retained by Mr. Shah for the limited purpose of contesting service and  
5 personal jurisdiction.

6           9. One week is not sufficient time to prepare a motion challenging  
7 service and personal jurisdiction on Mr. Shah's behalf, and to confer with Mr.  
8 Shah—who lives in Pakistan—to prepare an affidavit in support of that motion.

9           10. Yesterday and today, I communicated via email and direct telephone  
10 communication with DISH's counsel regarding Mr. Shah's request for an additional  
11 7-day extension on the time for him to respond to the Complaint and Mr. Shah's  
12 plan to file an ex parte application for that extension, if DISH did not agree to it.  
13 DISH's counsel indicated that DISH opposes the requested 7-day extension.

14           11. Counsel for Mr. Shah has also requested that DISH's counsel  
15 withdraw the proof of service on the grounds that it is a forgery and was not signed  
16 by Mr. Shah. DISH did not agree to withdraw the proof of service.

17  
18           I declare under penalty of perjury under the laws of California and the United  
19 States of America that the foregoing is true and correct to the best of my  
20 knowledge, information, and belief.

21           Executed at San Francisco, California, this 14th day of May, 2019.

22  
23           By: 

24           Alexander B. Parker  
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